

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

|  |   |                         |
|--|---|-------------------------|
| In re:   | ) | Chapter 11              |
|  | ) |                         |
| OLD LC, INC., <i>et al.</i> , <sup>1</sup>     | ) | Case No. 19-11791 (BLS) |
|  | ) |                         |
| Debtors.                                       | ) | (Jointly Administered)  |
| _____  | ) |                         |
|  | ) |                         |
| OFFICIAL COMMITTEE OF UNSECURED                | ) |                         |
| CREDITORS of OLD LC, INC., <i>et al.</i> , for | ) |                         |
| and on behalf of the ESTATES OF                | ) |                         |
| OLD LC, INC., <i>et al.</i> ,                  | ) |                         |
|  | ) | Adv. No. 20-51002 (BLS) |
| Plaintiff,                                     | ) |                         |
|  | ) |                         |
| v.   | ) |                         |
|  | ) |                         |
| UPFRONT V, LP, BREAKWATER CREDIT               | ) |                         |
| OPPORTUNITIES FUND, L.P., <i>et al.</i> ,      | ) |                         |
|  | ) |                         |
| Defendants.                                    | ) |                         |
| _____  | ) |                         |

**NOTICE OF AGENDA OF MATTERS SCHEDULED  
FOR HEARING ON AUGUST 19, 2021 AT 11:00 A.M. (ET)**

**This remote hearing will be conducted entirely over Zoom and requires all participants to register in advance. Please register by August 18, 2021, at 4:00 p.m. Eastern Time  
COURTCALL WILL NOT BE USED FOR THIS HEARING.**

**Please use the following link to register for this hearing:**

<https://debuscourts.zoomgov.com/meeting/register/vJItcumupj8oHGbpZPPKmWJf62v9bgnFENI>

**After registering your appearance by Zoom, you will receive a confirmation email  
containing information about joining the hearing.**

Topic: Old LC, Inc.

**Time: August 19, 2021, at 11:00 a.m. Eastern Time (US and Canada)**

---

<sup>1</sup> The Debtors are the following four entities (the last four digits of their respective taxpayer identification numbers, if any, follow in parentheses): Old LC, Inc. (7119), Old LC Holdings, Inc., Old LCF, Inc., and Old LC Parent, Inc. The Debtors' noticing address in these Chapter 11 cases is c/o Bryan Cave Leighton Paisner LLP, Attn: Mark I. Duedall, 1201 W. Peachtree Street, 14<sup>th</sup> Floor, Atlanta, Georgia 30309. The Debtors were formerly named Loot Crate, Inc., Loot Crate Holdings, Inc., LC Funding, Inc., and Loot Crate Parent, Inc. Following the closing of the sale of substantially all of the Debtors' assets, the Debtors filed the necessary documentation in the applicable jurisdictions to change their corporate names and filed the *Notice of Changes of Debtors' Names and Case Caption* [D.I. 265] with the Court, all in accordance with the terms of the sale and the order approving the same [D.I. 254].



## **RESOLVED MATTER**

1. Joint Unopposed Motion Pursuant to Section 362 of the Bankruptcy Code for Entry of an Order Confirming that the Automatic Stay Does Not Apply to Directors & Officers Insurance Policy or the Proceeds Thereof of for Stay Relief to the Extent Applicable [[D.I. 804](#) – filed June 30, 2021]

Objection Deadline: August 6, 2021 at 4:00 p.m. (ET)

Responses Received: None

Related Documents:

- a) Notice of Hearing [[D.I. 807](#) – filed July 23, 2021]
- b) Certification of Counsel [[D.I. 810](#) – filed August 10, 2021]

Status: The Movant has uploaded an order; no hearing is necessary.

## **MATTERS GOING FORWARD**

2. Motion of Upfront V, L.P., Upfront GP V, LLC, Mark Suster, Dana Kibler and Gregory Bettinelli to Dismiss First Amended Complaint and Objection to Claims and Motion to Strike Prayer for Compensatory Damages [[D.I. 35](#) – filed March 5, 2021]

Objection Deadline: April 5, 2021 at 4:00 p.m. (ET)

Responses Received:

- a) Plaintiff's Memorandum of Law in Opposition to Upfront Defendants' Motion to Dismiss [[D.I. 38](#) – filed April 5, 2021]
- b) Reply of Upfront V, L.P., Upfront GP V, LLC, Mark Suster, Dana Kibler and Gregory Bettinelli to Plaintiff's Memorandum of Law in Opposition to Upfront Defendants' Motion to Dismiss [[D.I. 41](#) – filed April 26, 2021]

Related Documents:

- a) First Amended Complaint and Objection to Claims [[D.I. 28](#) – filed February 5, 2021]
- b) Certification of Counsel re: Stipulation on Various Deadlines on the Motion to Dismiss [[D.I. 36](#) – filed March 25, 2021]
- c) Order Approving Stipulation [[D.I. 37](#) – filed March 26, 2021]
- d) Request for Oral Argument on Motion of Upfront V, L.P., Upfront GP V, LLC, Mark Suster, Dana Kibler and Gregory Bettinelli to Dismiss



First Amended Complaint and Objection to Claims and Motion to Strike Prayer for Compensatory Damages [[D.I. 42](#) – filed May 3, 2021]

- e) Notice of Completion of Briefing with Respect to Motion of Upfront V, L.P., Upfront GP V, LLC, Mark Suster, Dana Kibler and Gregory Bettinelli to Dismiss First Amended Complaint and Objection to Claims and Motion to Strike Prayer for Compensatory Damages [[D.I. 43](#) – filed May 3, 2021]
- f) Notice of Oral Argument on Motion of Upfront V, L.P., Upfront GP V, LLC, Mark Suster, Dana Kibler and Gregory Bettinelli to Dismiss First Amended Complaint and Objection to Claims and Motion to Strike Prayer for Compensatory Damages [[D.I. 73](#) – filed July 21, 2021]

Status: This matter is going forward.

Dated: August 17, 2021

Respectfully submitted,

**BRYAN CAVE LEIGHTON PAISNER LLP**

/s/ Mark I. Duedall

Mark I. Duedall (No. 3346)  
Leah Fiorenza McNeill (*admitted pro hac vice*)  
One Atlantic Center – Fourteenth Floor  
1201 W. Peachtree Street, NW  
Atlanta, Georgia 30309-3471  
Telephone: (404) 572-6600  
Facsimile: (404) 572-6999  
Email: mark.duedall@bclplaw.com  
leah.fiorenza@bclplaw.com

-and-

**ROBINSON & COLE LLP**

Natalie D. Ramsey (No. 5378)  
Jamie L. Edmonson (No. 4247)  
Mark A. Fink (No. 3946)  
1201 N. Market Street, Suite 1406  
Wilmington, Delaware 19801  
Telephone: (302) 516-1700  
Facsimile: (302) 516-1699  
Email: nramsey@rc.com  
jedmonson@rc.com  
mfink@rc.com

*Co-Counsel to the Debtors and Debtors-in-Possession*